

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	THE FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF HAMPTON)	
)	CIVIL ACTION NO.: 2022-CP-25-00285
MANUEL SANTIS-CRISTIANI,)	
)	
Plaintiff,)	PLAINTIFF'S RESPONSES TO
)	PALMETTO STATE BANK'S
)	FIRST SET OF INTERROGATORIES
Vs.)	
)	
RICHARD ALEXANDER "Alex")	
MURDAUGH, RONNIE L. CROSBY,)	
WILLIAM F. BARNES, III, RUSSELL)	
LAFFITTE, PALMETTO STATE BANK,)	
BANK, PETERS MURDAUGH,)	
PARKER, ELTZROTH & DETRICK,)	
P.A.,)	
)	
Defendants.)	

TO: WALKER GRESSETTE & LINTON, LLC, ATTORNEYS AT LAW, G. TRENHOLM WALKER, ESQUIRE; THOMAS P. GRESSETTE, JR., ESQUIRE; JAMES W. CLEMENT, ESQUIRE, ATTORNEYS FOR DEFENDANT, PALMETTO STATE BANK:

The Plaintiff herein answers the Interrogatories of Defendant as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to each interrogatory to the extent it seeks information that constitutes evidence or reflects confidential communications between the Plaintiff and the Plaintiff's attorneys.
2. Plaintiff objects to each interrogatory to the extent it seeks information that constitutes evidence or reflects trial preparation materials or work product of the Plaintiff or the Plaintiff's representatives, agents, or attorneys.
3. Plaintiff objects to each interrogatory to the extent it seeks information already available to or equally available to the Defendant.

4. The following interrogatory responses are based upon information presently available to the Plaintiff and are made without prejudice to the rights of the Plaintiff to utilize subsequently discovered information.
5. By making a response to any interrogatory or document request, the Plaintiff does not intend or mean to waive the attorney-client privilege, the work-product rule or any other privilege, objection or other limitation upon discovery as to that interrogatory or as to any other present or future request for discovery.
6. All answers to the interrogatories and responses to the requests for production of documents are made without the waiver of these general objections, or the specific objections which are hereinafter set forth.
7. The foregoing objections are general ones applicable to all categories of information to be produced. The following responses to any particular item of information.

INTERROGATORIES

1. Identify each person who provided information or otherwise consulted or assisted in connection with providing answers to these Interrogatories and identify the specific Interrogatories for which each such person supplied information or was consulted or assisted, the nature of any such consultation or assistance, and whether the information supplied was based on personal knowledge.

Answer: Blanca Simpson and Manuel Santis Cristiani provided information in connection with providing answers to all the interrogatories based on their personal knowledge. Each person aided with all the interrogatories contained herein. Additionally, Plaintiff's attorneys also assisted with the responses to these interrogatories.

2. Set forth a list of photographs, plats, sketches or other prepared documents in possession of the party that relate to the claim or defense in the case.

Answer: The following documents are applicable to this interrogatory:

- a. **Defendants' Motion to Interplead, Plaintiff's Document No. 1.¹**
- b. **PMPED Check No. 51699, for \$73,857.24. Doc. No. 2,**
- c. **Palmetto State Bank Wire Transfer Documents, filed as Exhibit B to Defendants' Motion to Interplead. Doc, No. 3.**
- d. **PMPED Check No. 51398 to Forge, Bank Markings dated 8/16/2021. Doc. No. 4,**
- e. **PMPED Check No. 1504777, Trust Account Check in the amount of \$70,000.00, with Memo line stating the following: replaces RAM misappropriation M Santis Cristani. Doc No. 5.**
- f. **Affidavit of Lee D. Cope dated October 21, 2022. Doc. No. 6.**
- g. **Affidavit of Ronnie L. Crosby dated October 22, 2022. Doc. No. 7.**
- h. **Affidavit of William F. Barnes, III dated October 20, 2022. Doc. No. 8.**
- i. **Affidavit of Chelci S. Avant dated October 18. 2021. Doc. No. 9.**
- j. **Response by MUSC to Defendant's Motion to Interplead. Doc. No. 10.**
- k. **Defendants' Motion to Dismiss filed November 29, 2022. Doc No. 11.**
- l. **Answer of Defendant's Palmetto State Bank to Plaintiff's Complaint. Filed December 18, 2022. Doc. No. 12.**

¹Reference to Plaintiff's is referring to the Plaintiff's Documents that are provided in response to the Defendants' for Production of Documents. Subsequent cites to Plaintiff's Documents will simply say "Doc, and page no.".

- m. Indictment of Richard “Alex” Murdaugh, Case No. 2021 GS-47-31, filed in the Case by Plaintiff on December 29, 2022. Doc. No. 13.**
- n. Transcript of Hearing in this case held on December 1, 2022. Doc. No. 14.**
- o. Answer in this case filed by PMPED, dated January 19, 2023. Doc. No. 15.**
- p. Answer of Russell L. Laffitte, dated February 3, 2023. Doc. No. 16.**
- q. Affidavit of Desa Ballard, including the Supplemental Affidavit of Desa Ball. Doc. No. 17.**
- r. Supplemental Affidavit of Desa Ballard. Doc. No. 18.**
- s. Settlement Disbursement Sheet provided by Defendants during the December 1, 2022 Hearing.**
- t. Copy of Trial Transcript of Richard Alexander Murdaugh during his criminal trial for murder.**
- u. Copy of Trial Transcript of Testimony of Jeanne Seckinger during the Criminal Trial of Richard for murder.**
- v. Copy of Trial Transcript of Testimony of Mark Ball during the Criminal Trial of Richard for murder.**
- w. Trial Transcript of testimony of Ronnie Crosby during the federal trial of Russell Laffitte. Doc. No. 22.**
- x. Post and Courier Newspaper Article, dated November 10, 2022, entitled “Former Murdaugh law partner testifies only bank could see funds diverted”, written by Thad Moore (tmoore@postand**

courier.com and Jocelyn Grzeszczak (jgrzeszczak@postandcourier.com). Doc. No. 23.

- y. CNN Article by Eric Levenson dated February 9, 2023, entitled “Best Friend testifies Alex Murdaugh admitted to drug addiction and stealing money [quoting Chris Wilson]”. Doc. No. 24.**
- z. Trial transcript of Ronnie L. Crosby during criminal trial of Richard Alexander Murdaugh for murder. Doc. No. 25.**
- aa. Transcript Vol IX from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 26.**
- bb. Transcript Vol VII from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 27.**
- cc. Transcript of federal Bonding hearing for Russell Laffitte, dated September 6, 2022, before Molly H. Cherry. Doc. No. 28.**
- dd. Transcript Vol III from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 29.**
- ee. Transcript Vol II from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 30.**
- ff. Transcript Vol IV from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 31.**
- gg. Transcript Vol V from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 32.**
- hh. Transcript Vol VI from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 33.**
- ii. Transcript Vol I from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 35.**

**jj. POA signed by Plaintiff to Russell LaFFitte. Possession:
Defendant Law Firm and or Russell LaFFitte.**

**kk. All documents in the personal injury file as possessed by the
Defendant Law Firm. Possession: PMPED Law Firm.**

3. Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

**Answer: Manuel Santis Cristiani
LOC Santo Doming Corona S/N
LOC Santo Domingo Corona 30187
LOC Margaritas, Chiapos Mexico
No written or recorded statement**

**Nick Gladd
No written or recorded statement**

**Andrew Pride (By phone)
No written or recorded statement.**

**Alex Murdaugh
Lieber Correctional Institute
Transcript of Murder Trial of Richard Alexander, Direct and
Cross. Possession: Trial Court Reporter.**

**William Barnes, III.
Address unknown
Affidavit of William F. Barnes, III,
Dated 10/20/2022; filed in the action on 10/21/2022**

**Gordon Spurill
Address unknown
No written or recorded statement.**

**Patrick Sugg, Esquire
Address unknown
No written or recorded statement.**

**Blanca Simpson
94 Wescott Street
Brunson, SC 29911
No written or recorded statement.**

Russell Laffitte
Address unknown
Statements at Federal Bond Hearing, dated September 6,
2022, before Judge Molly H. Cherry. Doc. No. 28.

Norris Lightsey Laffitte.
Address Unknown
Testimony in the federal trial of Russell LaFitte.
Doc No. 35.

Ronnie L. Crosby
Address Unknown
Transcript of Trial Testimony during federal trial of Russell
LaFFitte. Doc. No. 22.
Also statements to Post and Courier reporters, Doc. No. 23.

Jeanne Seckinger, CPA
Address Unknown
Transcript of Trial Testimony during Murder trial.
And Copy of Trial Testimony during the federal trial
Of Russell LaFFitte. Doc No. 30.

Chris Wilson
Address Unknown.
Statement made to Reporter Eric Levenson.
Doc. No. 24
Also Trial Transcript of his testimony at the Murder Trial of
Richard Alexander Murdaugh. Transcript in possession of
court reporter.

Lee D. Cope
Address Unknown
Affidavit of Lee D. Cope, dated 10/21/2022, filed
10/21/2022.

Plaintiff is also a witness. No statements that are
discoverable.

4. For each person known to the parties or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

Answer: Statements from all witnesses are provided in lieu of summary of their testimony. Trial transcripts of witnesses testimony during the murder trial of Richard Alexander Murdaugh have not been received, and the discovery will be supplemented once the transcripts of testimony is received.

5. Name any other person the Plaintiff knows to have discoverable information or knowledge of facts that could lead to discoverable information.

Answer: All individuals listed as a response to Interrogatory 4 above have discoverable information or knowledge or facts that could lead to discoverable information.

6. Please disclose who was present at the mediation of Civil Action No. 11-CP-15-767 and state in comprehensive narrative detail the Plaintiff's version of exactly what happened at the mediation and his understanding of its outcome.

Answer: Manuel Santis Cristiani

Nick Gladd

Andrew Pride (By phone)

Alex Murdaugh

William Barnes

Gordon Spurill

Patrick Sugg, Esquire

Blanca Simpson

Plaintiff understood that the mediation was not settled and that Alex Murdaugh ask him to sign a POA to Russell Laffitte, Bank President to continue negotiations on his behalf.

7. Please disclose the following information regarding the document granting Plaintiff's power of attorney to Russell Laffitte:

- a. The location, including address, where Plaintiff executed the document; and
- b. The names and addresses of all persons present when Plaintiff executed the document.

Answer: a) The POA was executed at the Law firm of PMPED, 101 Mulberry Street East, Hampton, SC 29924

**b) Blanca Simpson
94 Wescott Street
Brunson, SC 29911**

**Alex Murdaugh
Currently in Prison- Leiber Correctional Institute**

**Kristy Jarrell
Address unknown**

**Gregor Cristiani
Address unknown**

8. Please state in comprehensive narrative detail Plaintiff's version of why he executed the power of attorney naming Russell Laffite and its purpose.

Answer: Plaintiff executed the POA because he was instructed by his attorney, Alex Murdaugh to do so.

9. State the name, address and telephone number of each person who has investigated the facts of this case for or on behalf of Plaintiff.

Answer: Plaintiff's attorney of record have investigated the facts of this case o behalf of Plaintiff.

10. For each investigation of the facts of this case, state the date of the investigation, a description of the matter investigated, the reason for the investigation, whether any written report was made of the investigation, and the name, address and telephone number of the person who has custody of the report.

Answer: This information is protected by the attorney-client privilege or he attorney work-product rule. Therefore, Plaintiff objects to this interrogatory.

11. Describe all correspondence, including text messages, notes, emails, telephone messages, memoranda, or other communication, whether recorded, written or oral, related to the settlement of Civil Action No. 2011-CP-15-764, any funds recovered therefrom, or the subject matter of the pending lawsuit, between or among the following:

- a. Plaintiff;
- b. any of the Defendants;
- c. any employees, agents or representatives of any of the Defendants; and/or
- d. Blanca O. Turrubiate-Simpson, also known as Blanca Simpson.

Answer: a) On November 15, 2016, Plaintiff received a call from the Palmetto State Bank Official letting him know the monies from the settlement would be sent to him. On November 15, 2016, a wire transfer from the bank official was sent to Plaintiff.

b) None.

c) None.

d) Blanca was present when bank official contacted Plaintiff.

Plaintiff is not certain of the amount of money actually received, but he will endeavor to retrieve the said information from the bank. Importantly, Plaintiff does not necessarily agree that he received the amount reflected in the bank wire. For example, the documentation, Doc. No. 3, shows two alleged bank wires on two different dates. The first was for less than \$4,000 and the second alleged wire was just over \$70,000.00. At this point, Plaintiff needs to make inquiry at the bank to determine actually what was received.

12. Please state the full name, date of birth, place of birth, last residential address, the period of time resided at that address and prior residential addresses of the Plaintiff for the past ten (10) years.

Answer: Full name: Manuel Santist-Cristiani
 DOB: December 19, 1982
 POB: Las Margaritas, Chiapos, Mexico
 Address: LOC Santo Doming Corona S/N
 LOC Santo Domingo Corona 30187
 LOC Margaritas, Chiapos Mexico

13. Please provide a summary of all formal or trade education of the Plaintiff, including all schools attended with addresses and degrees/certifications received.

Answer: Plaintiff has a fourth grade education.

14. Please state the nature of the Plaintiff's employment and the names and addresses of his employers:

- a. on August 30, 2011 (the date that Civil Action No. 11-CP-15-764 was filed);
- b. for the ten years preceding August 30, 2011; and
- c. from August 30, 2011, to the date of the answers to these Interrogatories.

Answer: a) Not employed

b) Farm worker in Colleton County. Plaintiff does not recall the name of the employer or address.

c) Plaintiff is self-employed as agricultural worker.

15. Please state whether or not either Plaintiff has ever been a party to any other civil action and if so, please give the names of all parties, the date of such suit, and the Court in which each such suit was brought.

Answer: Other than the personal injury lawsuit that is the subject matter of this lawsuit, Plaintiff has not been a party to any other civil action.

16. Set forth a list of all crimes of any nature, excluding traffic offenses, for which the Plaintiff has been *arrested or convicted*, including dates, offenses, sentence and jurisdiction.

Answer: None.

17. List the names and addresses of any expert witnesses whom the party proposes to use at the trial of the case. Set forth the facts and documents which support the expert(s) opinion and attach all documents they rely upon.

Answer: Desa Ballard
236 State Street,
West Columbia, SC 29169
Plaintiff reserves the right to supplement additional
information as this discovery continues.

18. Has the Plaintiff or any person acting on Plaintiff's behalf had conversations with any of this Defendant's employees? If so, please state where, when and with whom such conversations were had.

Answer: No.

19. Do you contend that this Defendant, or any employee or representative of this Defendant, made any admission or statement against interest to Plaintiff or anyone else in connection with the matters alleged in this case? If your answer is anything other than an unequivocal "no," please set forth the following information for each such admission or statement against interest:

- a. the substance of each such admission or statement;
- b. the person(s) who made each such admission or statement;
- c. the persons present when the admission or statement was made;
- d. the time, date and place each such admission or statement was made; and
- e. if you contend the admission or statement was made in writing, identify specifically each document you contend contains each such admission or statement.

Answer: Yes.

- a. **The substance of such admission: the many pleadings in this case filed by the Defendants, especially the Motions to Dismiss, are statements against self interest admit that Richard Alexander Murdaugh stole the funds from the Plaintiff. The PMDED law was organized as a partnership. All partners are therefore vicariously liable for the tortious conduct of its partner, Richard Alexander Murdaugh. Additionally, during the hearing of December 1, 2022, Attorneys for the Defendants and the former law partners made numerous statements against self interest to establish that Richard Alexander Murdaugh misappropriated the funds from the Plaintiff.**

- b. **Person Making statements:** William Barnes, III, Ronnie Crosby, attorneys for the Defendants, Lee Cope, Jeanne Seckinger, Mark Ball, Richard Alexander Murdaugh, Norris Lightsey Laffitte, and Chelci S. Avant, made statements against self-interest against the respective Defendants. Moreover, Plaintiff will seek to amend its pleadings to allege a criminal enterprise between the law firm and the bank. Therefore, statements made by the named persons were statements against self-interest against the enterprise.

20. Specifically state each fact and identify each individual document upon which the Plaintiff relied to support the allegations in Paragraph 21 of the Complaint that “Defendant Russell [Laffitte] served as a conservator for Plaintiff” Do not make a general reference to the Complaint.

Answer: It is the understanding of the Plaintiff that Russell Laffitte served as POA on his behalf. The POA is in possession of the Defendant law firm. Blanca will also testify that such was the intent when Richard Alexander Murdaugh had Plaintiff sign the POA. Defendant admitted the same during the Motion Hearing of 12/1/2022.

21. Specifically state each fact and identify each individual document upon which the Plaintiff relied to support the allegations in Paragraph 21 of the Complaint that “Russell Laffitte received the funds from the Product Liability Case for deposit in Defendant Palmetto Bank.” Do not make a general reference to the Complaint.

Answer: To the extent the interrogatory uses the past tense of the word “rely”, Plaintiff objects because it seeks to examine the work-product of the attorney. However, the Plaintiff states that he relies upon the following document to support paragraph 21:
Doc. No. 3, Bank Wire Documentation and the testimony of Blanca. Plaintiff also relies the information contained on Check No. 51398 to Forge. The documentation as stated above shows that Russell LaFFitte, as a representative of Palmetto Bank, accepted the settlement funds for deposit in Palmetto Bank.

22. Specifically state each fact and identify each individual document upon which the Plaintiff relied to support the allegations in Paragraph 43 of the Complaint that this Defendant, Palmetto State Bank, “h[as] unlawfully converted the Plaintiff’s the (sic) settlement funds from Civil Action No.: 2011-CP-15-764” Do not make a general reference to the Complaint.

Answer: Defendant, Russell Laffitte has been convicted on related fraud charges. Alex Murdaugh is currently indicted for charges relating to this matter. See the Indictment of Murdaugh for converting Plaintiff’s funds. Moreover, the Affidavit of Desa Ballard states facts to support this allegation. To the extent the interrogatory seeks to gather information on counsel’s investigative techniques or work-product, Plaintiff objects.

23. Specifically state each fact and identify each individual document upon which the Plaintiff relied to support the allegations in Paragraph 51, including its subparts, of the Complaint as to this Defendant, Palmetto State Bank. Do not make a general reference to the Complaint.

Answer: See interrogatory #22. Also, See the testimony of Norris Lightsey LaFFitte (Doc No. 35) and the testimony of all bank officials during the federal trial of Russell Laffitte. The federal trial of Russell Laffitte composes Nine Volumes of Transcript. A copy of each volume is being provided to opposing counsel. Collectively, the testimony as represented during the federal trial of Russell Laffitte will support each and every allegation contained in paragraph 51. Pay close attention to the testimony of Norris Lightsey Laffitte. His testimony will establish that Russell Laffitte started the conspiracy with Richard Alex Murdaugh as far back as 2013, and everything started to unravel in 2021 after the firm discovered Murdaugh’s fraudulent scheme. For over 8 years, the Bank officials, especially its Board, failed to detect that Russell Laffitte was

violating bank policies and procedures as it relates to Richard Alexander Murdaugh's bank dealings. Russell Laffitte facilitated Murdaugh's theft of the Plaintiff's funds, and he breached the fiduciary duty as fostered by the POA that he held on behalf of the Plaintiff. To the extent the interrogatory uses the past tense of the word "rely", Plaintiff objects because it seeks to examine the work-product of the attorney.

24. Set forth an itemized statement of all damages, exclusive of pain and suffering claimed to have been sustained by the Plaintiff.

Answer: The exact amount of Plaintiff's damages are unknown at this time because it cannot be determined exactly how much the law firm retrieved on the Plaintiff's behalf from the personal injury lawsuit. At this point, certainly the \$70,000 is damages, plus the intangible emotional damages in excess of \$400,000.00. Additionally, punitive damages cannot be measured with certainty at this point because we do not know the net worth of the Defendants.

25. Set forth a list of all exhibits or other documents, which may be used in the trial of this case as exhibits, evidence, for demonstrative purpose, for impeachment or for cross-examination.

Answer: All documents listed in response to Interrogatory 2 above will potentially be submitted as exhibits by the Plaintiff. The said documents are all being provided to the Defendants. As to documents not in Plaintiff's possession at this time, the same will be provided to the Defendants upon receipt.

26. Describe, by name and citation or other generally recognized identification, decisions, statutes, ordinances, acts, codes, regulations, legal principles, standards, and customs or usages, which you contend are specifically applicable to this action.

Answer: Plaintiff objects to this interrogatory. Plaintiff has identified his theory of the case in the Complaint. Defendants have access to all the case law, rules, and legal principles that support the Plaintiff's case.

27. Identify all records requests, subpoenas and the like that the Plaintiff has issued related to the claims at issue in this lawsuit.

Answer: None at this time. Plaintiff reserves the right to supplement this response.

28. With respect to any payments related to Civil Action No. 2011-CP-15-00764 which Plaintiff has received or that were made by Plaintiff or on Plaintiff's behalf by any source, please state the amount and payee of each payment, the name and address of the person, insurance company, corporation or other entity making each payment, and the nature of each payment made.

Answer: Plaintiff received a wire. He cannot recall the exact amount. The alleged wire documentation as provided by the Defendants is represented by Doc. No. 3. Plaintiff cannot authenticate this documentation. Plaintiff cannot recall the exact amount that he received, in that it was also seven years ago. Plaintiff will make a reasonable effort to retrieve the documentation from the bank, and he will supplement this response. One fact that is confusing is that the documentation shows two separate wires as previously discussed. Plaintiff is not certain that he received both wires, nor is Plaintiff certain that both wires were sent. Russell Laffitte has been convicted of conspiracy to defraud. Therefore, Plaintiff is not certain that the bank wire documentation is simply another party of Russell Laffitte's scheme to defraud.

29. Please state the phone number and wireless carrier for Plaintiff's cellular phone since August 30, 2011, the date that Civil Action No. 11-CP-15-764 was filed.

**Answer: Telcel
011-529191475858**

30. Please state all email addresses and internet service providers Plaintiff has used since August 30, 2011, the date that Civil Action No. 11-CP-15-764 was filed.

Answer: Plaintiff does not have an email address.

31. Please identify each time Plaintiff has travelled to the United States since August 30, 2011, the date that Civil Action No. 11-CP-15-764 was filed, and provide the following information for each such occasion:

- a. The dates Plaintiff was present within the United States;
- b. The purpose(s) of Plaintiff's trip to the United States;
- c. Plaintiff's destination(s) within the United States; and
- d. Whether Plaintiff met with any of the Defendants, Blanca Simpson, Glenn Walters, Sr., or Korey L. Williams and, if so, which one(s)

Answer: a) **The Plaintiff travelled to the United States On March 2012 and Nov/December 2022.**
 b) **Plaintiff was notified of a court hearing.**
 c) **Hampton, South Carolina.**
 d) **Plaintiff met with Blanca Simpson and his attorney.**
Any other information concerning Plaintiff's interaction with his attorneys is privileged.

32. Did any entity, charitable organization, or fundraising group compensate Plaintiff or any agent representing Plaintiff directly or indirectly, either for medical expenses, related health care, or any other debt or obligation incurred in connection with the incidents which form the subject of this action? If so, for each such entity please supply the following information:

- a. The name and address of the entity;
- b. The date upon which the claim was made and the nature and substance of the claim made; and
- c. An itemization of all payments received by Plaintiff or an agent on Plaintiff's behalf by this entity.

Answer: None.

Only the signature blocks are contained on this page.

LAW OFFICE OF KOREY L. WILLIAMS & ASSOCIATES

S/Korey L. Williams

KOREY L. WILLIAMS, ESQUIRE

Attorney for Plaintiff

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(803) 878-

SC Bar ID: _____

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LAW OFFICE OF GLENN WALTERS, SR., P.A.

S/Glenn Walters, Sr.

GLENN WALTERS, SR., ESQUIRE

Attorney for Plaintiff

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1910 Russell Street (29115)

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(803) 531-8844

(803) 531-3628

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glennwaltersp@gmail.com

Date: 07/25/2023